

# Exhibit C

**quinn emanuel trial lawyers | los angeles**

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**CONFIDENTIAL**

March 31, 2025

**VIA ELECTRONIC MAIL**

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Re: Lively v. Wayfarer Studios, No. 1:24-cv-10049-LJL, Subpoena to Edgeworth Security Services LLC

Dear Counsel:

We write on behalf of our clients, Jonesworks LLC and Stephanie Jones (collectively “Jonesworks”) in response to your letter of March 21, 2025 regarding the subpoena your clients served on Edgeworth Security Services LLC (“Edgeworth”) in the above-captioned matter.

As discussed during Jonesworks’ conferences with both you and counsel for Edgeworth, Jonesworks has reviewed the documents that are in Edgeworth’s possession, custody and control that may be responsive to the subpoena to the extent it calls for documents related to Blake Lively, Ryan Reynolds, Justin Baldoni, Wayfarer Studios, Jennifer Abel, Melissa Nathan, Steve Sarowitz, Leslie Sloane, or any of the other individuals, companies or issues involved in this case. As detailed in the attached privilege log and in accordance with Federal Rule of Civil Procedure 45(e)(2) and Local Civil Rule 26.2, all such documents are protected from disclosure and will not be produced.

Lastly, Jonesworks again objects to the subpoena as an improper means of obtaining party discovery. In addition to Jonesworks’ participation as the plaintiff in the related case of *Jones v. Abel*, your clients have pled a third-party complaint against Jonesworks in the above-captioned

**quinn emanuel urquhart & sullivan, llp**

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case. Given the timing of the subpoena, your correspondence and the third-party complaint, Jonesworks expects that your clients knew they intended to add Jonesworks as a party at the time of issuing and pursuing the subpoena to Edgeworth seeking Jonesworks' documents. This only heightens the impropriety of seeking Jonesworks' privileged documents from a third party as a means of attempting to circumvent that privilege.

We expect that this letter will resolve this matter and that your clients will address any future requests for Jonesworks' documents to it through the proper channels of party discovery.

Regards,



Kristin Tahler

Copy to: Daryl Crone, Counsel for Edgeworth Security Services LLC  
All Counsel of Record

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**Privilege Log of Jonesworks LLC and Stephanie Jones**  
 Documents in the Possession of Edgeworth Security Services LLC

<b>Category Number</b>	<b>Dates</b>	<b>Participants</b>	<b>Description</b>	<b>Privilege</b>
1	May 10, 2024	Stephanie Jones Chad Brockway Michael J. Kump Aaron Liskin	Email correspondence among client, counsel, and Edgeworth regarding requests for and reports of pre-litigation consulting and forensic services relating to defamation against Ms. Jones and Jonesworks LLC in connection with anticipated litigation.	Attorney-Client Privilege Work Product
2	May 10, 2024	Stephanie Jones Gordon Duren Jason Hodes Chad Brockway Olivia Chapman Kenneth Young Michael J. Kump Aaron Liskin	Email correspondence among clients, counsel, and Edgeworth regarding requests for and reports of pre-litigation consulting and forensic services relating to defamation against Ms. Jones and Jonesworks LLC in connection with anticipated litigation.	Attorney-Client Privilege Work Product
3	November 8, 2024 – February 10, 2025	Stephanie Jones Chad Brockway Alex Taylor Kristin Tahler Nicholas Inns	Email correspondence among clients, counsel, and Edgeworth regarding requests for and reports of pre-litigation consulting and forensic services relating to defamation against Ms. Jones and Jonesworks LLC in connection with anticipated and ongoing litigation.	Attorney-Client Privilege Work Product
4	May 10, 2024 – November 28, 2024	Stephanie Jones Chad Brockway Olivia Chapman Kenneth Young	Email correspondence between Stephanie Jones and Edgeworth regarding requests for and reports of pre-litigation consulting and forensic services relating to defamation against Ms. Jones and Jonesworks LLC in connection with anticipated and ongoing litigation.	Work Product

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5	May 8, 2024 – September 17, 2024	Stephanie Jones Chad Brockway	Text messages between Stephanie Jones and Edgeworth regarding requests for and reports of pre-litigation consulting services relating to defamation against Ms. Jones and Jonesworks LLC in connection with anticipated litigation.	Work Product
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